



June 3, 1993

Mr. Kenneth G. Mensing
Illinois Environmental Protection Agency
2009 Mall Street
Collinsville, Illinois 62234

RE: SITEX Project #7438
Kiel Center Project

Dear Mr. Mensing:

SITEX Environmental, Inc. (SITEX), and our client, the City of St. Louis, appreciated the opportunity we had on May 25, 1993 to discuss our concerns regarding the Kiel Auditorium demolition and the reported disposal of this material by the demolition contractor, Integrated Waste Special Services, Inc., at Illinois Environmental Protection Agency "Site Q" in Sauget, Illinois.

SITEX conducted extensive assessments of all hazardous or potentially hazardous materials within the Kiel Auditorium. Data from these assessments was used to develop remediation and abatement plans for all identified materials in the complex. Abatement and remediation of all identified materials was then conducted under SITEX oversight and according to stringent specifications developed by SITEX. No demolition activities were allowed to start until the building was certified by SITEX as being clear of all hazardous materials.

Although not normally associated with concrete, the potential for asbestos within the building concrete was also investigated by SITEX. The analysis of this material indicated the concrete did not contain asbestos. The results of this testing were submitted to Ms. Christine Mondragon of your office on May 25, 1993 and are attached to this letter for your reference.

We therefore consider the concrete and demolition debris that was removed from Kiel Auditorium free of contamination when it left the project site and do not consider the City of St. Louis a generator of any hazardous materials related to this material. We request your response to this position if you do not agree.

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Mr. Kenneth G. Mensing
June 3, 1993
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Again, we appreciate the opportunity to discuss our concerns with you and your consideration in this matter.

Yours truly

Kent D. Gastreich
Kent D. Gastreich, P.E., C.P.G.S.
Manager, Technical Services Group

cc: Mr. Bart Hager, SLDC
✓ Mr. Paul Tackas, IEPA

Attachment

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MEMORANDUM

TO: Ms. Christine Mondragon
Illinois EPA
2009 Mall Street
Collinsville, Illinois 62234

FROM: Sylvester B. Douglas

DATE: May 25, 1993

SUBJ: Material content of cemetitious debris
associated with the demolition of the
Kiel Auditorium for the
Kiel Center Project Land Clearance for
Redevelopment Authority of the City of St. Louis
SITEX PROJECT NOS. 7436/7450

TRANSMITTAL NO. R-17

SITEX Environmental, Inc. (SITEX) is presenting the following bulk sample results along with the laboratory analysis as confirmation of the material content of the cement and firebrick associated with the Kiel Auditorium.

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Bulk Sample Results
Kiel Center Project
St. Louis, Missouri
PROJECT NOS. 7436/7450

<u>Sample No.</u>	<u>Description</u>	<u>Asbestos Content</u>
7436-012	north wall pillar orchestra pit hallway mezzanine level	none detected
7436-015	coating inside pillar (#223) exhibition level	none detected
7436-4000	concrete pillar Auditorium demolition debris	none detected
7450-014	fire brick Kiel Club tank room	none detected



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Laboratory

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BULK SAMPLE ANALYSIS

Page 1 of 2

Client: SITEX

Date Received: 9-30-91

Client Project No.: 7436

Date Reported: 9-30-91

Technique: Polarized Light Microscopy with Dispersion Staining
In accordance with NIOSH 7403 Draft Method

Lab No.	Sample No.	Asbestos Detected & Percentage *	Fibrous Material	Non-Fibrous Material
-1763	7436-004	20-25% Chrysotile	Glass wool, Cellulose	Paint, Tar, Binders
-1764	7436-005	20-25% Chrysotile	Glass wool, Cellulose	Polyfoam, Paint, Tar, Binders
-1765	7436-006	1-5% Chrysotile		Polyfoam, Paint, Tar, Binders
-1766	7436-007	None Detected		Polyfoam, Paint, Binders
-1767	7436-008	None Detected		Polyfoam, Binders
-1768	7436-009	None Detected		Polyfoam, Binders
-1769	7436-010	None Detected		Polyfoam, Paint Binders
-1770	7436-011	None Detected	Cellulose	Aggregate, Paint Binders
-1771	7436-012	None Detected		Aggregate, Paint Binders
-1772	7436-013	None Detected	Cellulose	Aggregate, Paint Binders

Comments:

The upper detection limit is 100 percent.

The lower detection limit is less than 1 percent.

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BULK SAMPLE ANALYSIS

Client: SITEX

Date Received: 9-30-91

Client Project No.: 7436

Date Reported: 9-30-91

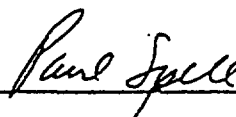
Technique: Polarized Light Microscopy with Dispersion Staining
In accordance with NIOSH 7403 Draft Method

Lab No.	Sample No.	Asbestos Detected & Percentage *	Fibrous Material	Non-Fibrous Material
1773	7436-014	None Detected	Cellulose	Binders
1774	7436-015	None Detected		Aggregate, Paint, Binders
1775	7436-016	85-90% Chrysotile	Antigorite	Paint, Binders
1776	7436-017	None Detected		Aggregate, Binders
1777	7436-018	None Detected	Cellulose	Aggregate, Binders
1778	7436-019	None Detected	Cellulose	Binders
1779	7436-020	None Detected	Cellulose	Binders
1780	7436-021	None Detected	Cellulose	Aggregate, Binders
1781	7436-022	65-70% Chrysotile	Cellulose	Wire, Binders

Comments:

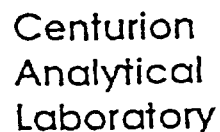
The upper detection limit is 100 percent.

The lower detection limit is less than 1 percent.



Paul Spell
Laboratory Supervisor

EPA Bulk Asbestos Proficiency Testing Program Identification # 63043-001
Accredited by RTI Center for Measurements and Quality Assurance



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Date Received: 5-11-93

Date Reported: 5-12-93 . .

Lab No.	Sample No.	Asbestos Detected & Percentage %	Fibrous Material	Non-Fibrous Material
B-4089	7436-4000	None Detected	Cellulose	Aggregate, Binders

Comments: ////////////////////////////////////

* The upper detection limit is 100 percent.
The lower detection limit is less than 1 percent.

Laura Mitchell

Laura Mitchell
Laboratory Supervisor

AIHA Bulk Asbestos Proficiency Testing Program Identification # 63043-001
RTI Center for Measurements and Quality Assurance

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11905 BORMAN DRIVE ☎ ST. LOUIS, MISSOURI 63146 ☎ (314) 569-3204 ☎ FAX (314) 569-0051



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BULK SAMPLE ANALYSIS

ent: SITEX

Date Received: 10-30-91

ent Project No.: 7450

Date Reported: 10-31-91

Technique: Polarized Light Microscopy with Dispersion Staining
In accordance with NIOSH 7403 Draft Method

Lab No.	Sample No.	Asbestos Detected & Percentage *	Fibrous Material	Non-Fibrous Material
2019	7450-012	None Detected 10-15% Chrysotile in mastic		Aggregate, Binders
2020	7450-013	None Detected	Glass wool, Cellulose	Paint, Binders
2021	7450-014	None Detected	Cellulose	Binders
2022	7450-016	None Detected		Paint, Binders
2023	7450-017	None Detected	Cellulose	Paint, Binders

Comments:

The upper detection limit is 100 percent.

The lower detection limit is less than 1 percent.

Paul Spell
Laboratory Supervisor

IHA Bulk Asbestos Proficiency Testing Program Identification # 63043-001
Accredited by RTI Center for Measurements and Quality Assurance